

Jennifer

June 1, 2018

Governor's Office of Planning and Research
State Clearing House
Scott Morgan, Director
1400 Tenth Street, Room 117
Sacramento, CA 95814

Re: **Objections to ELDP Application by MCAF Vine, LLC**
State Clearing House Tracking No. 2018051002; Hollywood Center Project

Dear Mr. Morgan:

I first moved to Hollywood in 2004, served on the Board of the Hollywood Studio District Neighborhood Council from 2014 to 2016, and served as Vice Chair of the Neighborhood Council at the approximate time that the community's successful lawsuit against the Millennium Hollywood project was in progress.

The ELDP application by Millennium (MCAF Vine, LLC) is difficult to respond to because much of its fundamental premise is flat wrong.

The application repeatedly contends that L.A. is growing, and Hollywood, with its multiple transit connections and urban configuration, is one of the city's most well-suited areas to absorb growth. The application states that there is an increasing population in Los Angeles, and an abundance of jobs but a lack of housing in Hollywood. Sounds reasonable and it's an argument that's been trumpeted for years by business proponents and development interests. Yet the reality is that such sophistry has no basis in fact, particularly in Hollywood.

The truth is that L.A. is not significantly growing, particularly in Hollywood, where the population has in fact experienced a steep and accelerating decline for the past two decades. According to official U.S. Census figures, the Hollywood Plan area declined in population by 3,088 persons from 1990 to 2000, and further declined by 12,596 people from 2000 to 2010. These measured decreases occurred while SCAG was erroneously estimating that the Hollywood Plan area was experiencing an increase of 25,000 people. Ironically, some of the largest population declines in Hollywood were in

census tracts adjacent to Metro subway stops. Similar significant population reductions were recorded in the census tracts radiating out from the Red Line stops, showing a consistent exodus of people from Hollywood. L.A.'s City Planning Department acknowledged this trend in its environmental analysis for the 2012 updated Hollywood Community Plan, eliminating all references in the Final EIR to population growth as a basis for approving more development in the Hollywood area. The facts related to Metro ridership also confirm these numbers: public transit use in Los Angeles County has dramatically declined since 1985 despite increased fixed rail availability.

So why are people leaving Hollywood, and why are those who remain so opposed to developments like Millennium's? It's because the City's plan for future growth sidesteps key realities related to infrastructure capacity and health and safety concerns. Many of the areas proposed for the greatest increases in residential density border the 101 Freeway, ignoring the wealth of scientific data showing that densification near freeways is intrinsically dangerous to the health and safety of both children and adults because of air quality/health risk impacts. And many of these areas are also within reporting districts with the highest rates of violent crimes, traffic congestion, and a shocking deficiency of parks and open space. No tangible measures have been suggested by the City to fund the infrastructure improvements necessary to mitigate further densification, particularly the addition of tens of thousands of residents to Hollywood's most vulnerable neighborhoods, or to even alleviate the underlying conditions that seriously impair the quality of life currently experienced by existing residents.

The application keeps thumping its theme that Hollywood needs more housing, and that "the Project would reduce the housing shortage that currently exists in the City." (Page 34.) But the L.A. Chamber of Commerce in its annual State of L.A. report identified Council District 13, where the project would be, as having the highest residential vacancy rate in Los Angeles. Although the Chamber report didn't specify the areas of greatest vacancy in CD13, much of that has to be in Hollywood simply due to the spate of construction in Hollywood versus lack of land availability in other areas like Silver Lake and Echo Park, including greater zoning restrictions for those communities. Conversely, Hollywood has the second highest homeless population in Los Angeles (more than double Venice). Increased luxury housing production therefore does not counter an expanding homeless population.

The two proposed project sites are limited through "D" development conditions to floor area ratios ("FAR") of 3:1 and 2:1. The applicant is requesting an 8:1 FAR while claiming that the actual project will be contained at a 6.975:1 FAR. The project is also requesting FAR ratio averaging approval as a unified development under LAMC Section 12.24.W.19. This code section has two caveats: 1) the project can be unified if "separated only by a street or alley" when and only if "the development as viewed from adjoining streets appears to be a consolidated whole." Vine St. is acknowledged in the application as a 100-foot-wide thoroughfare, not a collector street or local street. I

assume it's a local highway. The Project, therefore, cannot be viewed as a "consolidated whole" any more than a project divided by the 101 Freeway. Second, under Section 12.24.W.19(a), "the floor area ratio for the unified development, when calculated as a whole, may not exceed the maximum permitted floor area ratio for the height district(s) in which the unified development is located." Yet that illegal exceedance is what the developer is attempting to do with its FAR request.

The application lists other housing developments on page 17. These include the 1,100 units for the Blvd. 6200 project (now called East Towne to the north and 6200 to the south); 550 units for the Vine apartments; 114 units for the 6226 Yucca development, among others. There are also several refurbished buildings recently converted to housing next to the site, such as the Knickerbocker Hotel, the Broadway building, and the Hollywood/Vine building. In each of those projects, which have produced over 5,000 residential units since 2005, the maximum height has been 150 feet. In the case of Blvd. 6200, the height ranges from 55 feet to 85 feet. Yet the application keeps stating that the project is consistent with development patterns in the Vine/Yucca area ("there is no detriment to the general welfare of the City, the surrounding community or the future residents of the Property because the Project's density and scope were designed and are appropriate for the Property and the surrounding properties" (Page 37), and that its 1,005 residential units provide "much needed housing."

This is a cynical statement, as the 133 Senior "affordable units" being proposed come with a catch on page 21 that the applicant seeks "a development modification to allow a greater number of smaller affordable units with less bedrooms to accommodate Senior Affordable Housing Units in lieu of providing the requisite number of Restricted Affordable Units." The language implies that the affordable units will be all singles, and potentially micro units, while the law requires that units set aside for restricted affordable use be the same square footage as marketplace units (to allow for low-income families). Rents are based on habitable rooms – a single that is 400 square feet in size can be rented at the same rate as a single 300 square feet in size. The request implies that the rent per square foot would be higher than standard affordable units, and therefore closer to market rate, while reaping the incentives that come under State law for rewarding "affordable" units. At page 44, the application states "the Project would provide a mix of housing unit types, from one-bedroom units to three bedrooms, and would accommodate demographic shifts." Apparently not for poor or elderly people.

The application states at page 63 "the nearest single-family residential neighborhood is north of the Property across the 101 Freeway. Therefore, no single-family neighborhood would be affected by the new development." This is incorrect. One block east of the project site is an established neighborhood between Argyle and Gower St. that is primarily single-family historic homes.

At page 64, the application states “Hollywood is a job center with existing large office buildings and motion picture production facilities.” The only remaining major studio headquarters in Hollywood is Paramount Studios at Melrose Ave. and Gower St. There are no longer any major television stations in Hollywood. The main employer in Hollywood (and Los Angeles) is tourism, which is L.A.’s number one industry.

At page 68, the application says that there are 12 alcohol licenses sought for on-site consumption, but then says in the next paragraph that only 4 licenses are sought. The applicant further seeks licenses for off-site consumption. The area is saturated with alcohol. In 2015, then CD13 Planning Director Marie Rumsey publicly stated that in Hollywood “There is no need for an additional convenience market to dispense alcohol.” Her remarks came in response to a request for a permit to sell a full line of alcohol at a 7/11 located at the intersection of Hollywood Blvd. and Gower St., two blocks from the site. The 7/11 had been in continuous operation for 25 years.

In contrast, the application for a liquor store not only doesn’t have an operator, its construction is years away. There has been no LAPD input whatsoever on this request.

A similar request was for the Palladium project. It is in a census tract where 5 alcohol licenses are permitted but 33 already exist. It is in a crime reporting district that is not only 547% higher than the citywide average but has seen crime rates nearly double between 2010 and 2014, when almost every other reporting district had a decline in crime.

Across Sunset Blvd. from Palladium, the census tract is permitted to have 3 alcohol licenses, yet 15 already exist.

Across Vine Street from Palladium the census tract is permitted to have 5 alcohol licenses, but 59 already exist.

The census tract at Hollywood and Vine is permitted to have 3 alcohol licenses, but 24 already exist.

LAPD Hollywood Division had 314 officers to cover an area of 17.2 square miles. The National Association of City Managers and Police Dept. standard is 4 sworn officers per 1,000 residents, which means that just the Hollywood population of 198,000 citizens requires 792 officers, or 478 more officers than the entire division has, and which doesn’t even factor in the ten million tourists who visit Hollywood every year.

Alcohol is the third leading cause of preventable death in the U.S. and causes 2,500 deaths in L.A. County each year. As Marie Rumsey said, Hollywood doesn’t need another convenience market to dispense alcohol.

The project seeks reduced parking per AB744. Although AB744 addresses parking stall reductions for projects near a major transit stop that include affordable units, the state law also allows the city to show with an area-wide study that there is a need for a higher parking ratio. The city's failure to make such data available for analysis does not lessen the parking impacts associated with the Project, which proposes a significant parking reduction in a known parking congested district.

The notion that an agency "should not be allowed to hide behind its own failure to gather relevant data" (Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 311) applies fully here. The Millennium developer's ELDP application is misleading, incomplete, and in many instances, demonstrably false. The application for ELDP status should be denied.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer", with a long horizontal flourish extending to the right.

Jennifer